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19 *Attorneys for Defendant*
20 DISCORD INC.

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23 **UNITED STATES DISTRICT COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**
25 **SAN FRANCISCO DIVISION**

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27 ZHEA ZHEA ZARECOR AS PERSONAL
28 REPRESENTATIVE OF ZHEA ZARECOR
1 SALAZAR, individually and on behalf of all
2 others similarly situated,

3 Plaintiff,
4
5 v.
6
7 DISCORD INC.,

8
9 Defendant.

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11 Case No. 3:23-cv-05385-JSC

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13 **SIXTH STIPULATION TO EXTEND TIME**
14 **TO RESPOND TO COMPLAINT (L.R. 6-1)**

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16 Complaint Filed: October 20, 2023
17 Complaint Served: November 29, 2023
18 Current Response Date: April 15, 2024
19 New Response Date: April 29, 2024

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21 **CLASS ACTION**

1 Plaintiff Zhea Zarecor as Personal Representative of Zhea Zarecor Salazar (“Plaintiff
2 Zarecor”) and Defendant Discord Inc. (“Discord”), pursuant to Local Rule 6-1, hereby stipulate to the
3 following extension of time for Discord to respond to the Complaint:

4 **WHEREAS**, on October 20, 2023, Plaintiff Zarecor filed her Complaint alleging, on behalf of
5 herself as personal representative of Zhea Zarecor Salazar and a proposed nationwide class, violations
6 of California’s Unfair Competition Law (Cal. Bus. & Prof. Code § 17200, et seq.), violations of
7 California’s Consumer Legal Remedies Act (“CLRA”) (Cal. Civ. Code § 1750, et seq.), violations of
8 California Business and Professional Code §§ 17500, et seq., violations of Texas’ Deceptive Trade
9 Practices-Consumer Protection Act (“DTPA”), and unjust enrichment by Discord;

10 **WHEREAS**, on November 29, 2023, Plaintiff Zarecor served her Complaint on Discord;

11 **WHEREAS**, pursuant to Rule 12(a)(1) of the Federal Rules of Civil Procedure, Discord’s
12 response to the Complaint was due on December 20, 2023;

13 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
14 extend the time for Discord to respond to the Complaint to January 19, 2024 (a 30-day extension);

15 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
16 the Complaint to January 19, 2024;

17 **WHEREAS**, on December 19, 2023, Discord filed a joint stipulation to extend the time for it
18 to respond to the Complaint to January 19, 2024 (Dkt. No. 9);

19 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
20 extend the time for Discord to respond to the Complaint to February 19, 2024 (a 31-day extension);

21 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
22 the Complaint to February 19, 2024;

23 **WHEREAS**, on January 17, 2023, Discord filed a second joint stipulation to extend the time
24 for it to respond to the Complaint to February 19, 2024 (Dkt. No. 20);

25 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
26 further extend the time for Discord to respond to the Complaint to March 4, 2024 (a 14-day extension);

27 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
28 the Complaint to March 4, 2024;

1 **WHEREAS**, on February 19, 2023, Discord filed a third joint stipulation to extend the time
2 for it to respond to the Complaint to March 4, 2024 (Dkt. No. 24);

3 **WHEREAS**, Discord conferred with Plaintiff's counsel and requested that Plaintiff agree to
4 further extend the time for Discord to respond to the Complaint to March 25, 2024 (a 21-day
5 extension);

6 **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to
7 the Complaint to March 25, 2024;

8 **WHEREAS**, on March 4, 2023, Discord filed a fourth joint stipulation to extend the time for
9 it to respond to the Complaint to March 25, 2024 (Dkt. No. 26);

10 **WHEREAS**, Discord conferred with Plaintiff's counsel and requested that Plaintiff agree to
11 further extend the time for Discord to respond to the Complaint to April 15, 2024 (a 21-day extension);

12 **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to
13 the Complaint to April 15, 2024;

14 **WHEREAS**, on March 25, 2023, Discord filed a fourth joint stipulation to extend the time for
15 it to respond to the Complaint to April 15, 2024 (Dkt. No. 28);

16 **WHEREAS**, the parties are engaged in productive discussions regarding the possibility of an
17 early resolution of this matter, and Discord has conferred with Plaintiff's counsel and requested that
18 Plaintiff agree to extend the time for Discord to respond to the Complaint to April 29, 2024 (a 14-day
19 extension) in order to facilitate such discussions;

20 **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to
21 the Complaint to April 29, 2024;

22 **WHEREAS** the requested extension will not affect any dates set by the court; and

23 **WHEREAS**, this is the sixth stipulation by the parties for an extension of time for Discord to
24 respond to the Complaint.

25 **IT IS HEREBY STIPULATED** by and between the parties that Discord's date to respond to
26 the Complaint, by answer, motion, or otherwise, is extended to and including **April 29, 2024**.

1 Dated: April 15, 2024

KALIELGOLD PLLC

2 By: /s/ Sophia G. Gold

3 JEFFREY D. KALIEL
4 SOPHIA G. GOLD
5 SCOTT EDELSBERG

6 Attorneys for Plaintiff

7 Dated: April 15, 2024

KING & SPALDING LLP

8 By: /s/ Quyen L. Ta

9 QUYEN L. TA
10 ALVIN LEE

11 Attorneys for Defendant
12 DISCORD INC.

13

14 **L.R. 5-1 ATTESTATION**

15 I, Quyen L. Ta, attest that all signatories listed herein, and on whose behalf this filing is
16 submitted, concur in this filing's content and have authorized this filing.

17 By: /s/Quyen L. Ta

18 QUYEN L. TA